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**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION AT MEMPHIS**

2016 AUG 12 PM 3:01

THOMAS M. GOULD
CLERK, U.S. DISTRICT COURT
WD OF TN, MEMPHIS

Lucille Catron

Plaintiff

vs.

THE CITY OF MEMPHIS,
Terrence Patterson, President of the DOWNTOWN MEMPHIS COMMISSION
BEALE STREET MERCHANT ASSOCIATION,
Downtown Tourism Development Authority

Defendants.

COMPLAINT

Come now the Plaintiff, LUCILLE CATRON, Citizen of the United States, the State of Tennessee and the City of Memphis in the County of Shelby continuously for 57 years resides at 1009 Grand Street, Memphis, Tenn sues the defendants, particularly doing the period in question THE CITY OF MEMPHIS, TERRENCE PATTERSON, PRESIDENT OF THE DOWNTOWN MEMPHIS COMMISSION, the BEALE STREET MERCHANT ASSOCIATION, DOWNTOWN TOURISM DEVELOPMENT AUTHORITY

Plaintiff, Lucille Catron states that Historical Beale Street was caused to be developed by The Beale Street Development Corporation, a 23 MILLION DOLLAR PROJECT. BEALE STREET DEVELOPMENT CORPORATION WAS CHARTERED IN THE STATE OF TENN in 1973. Beale Street Development Corporation solicited and received the very first 1.3 MILLION DOLLARS FROM THE FEDERAL GOVERNMENT AND A GRAND TOTAL OF 23 Million Dollars FROM THE FEDERAL GOVERNMENT, STATE OF TENN, CITY OF MEMPHIS AND SHELBY COUNTY FOR THE REDEVELOPMENT, REVITALIZATION OF PUBLIC HISTORICAL BEALE STREET and the 23 Million Dollar Project was paid for by the TAXPAYERS, THE CITIZENS OF THE COUNTY OF SHELBY, CITY OF MEMPHIS TENN.

And for the cause of action which states as follows:

The Plaintiff LUCILLE CATRON states that on or about April 10th 1989 a complaint was filed in Federal Court Case #89-2304-HB against the CITY OF MEMPHIS and other entities conspiring in concert, alone in conspiracy to deny a citizen his constitutional rights as a citizen of the United

States, and the City of Memphis, Shelby County FOR SIMILAR REASONS. The Plaintiff LUCILLE CATRON on or about JUNE 9TH 2016 states that the CITY OF MEMPHIS, TERRENCE PATTERSON, PRESIDENT OF THE DOWNTOWN MEMPHIS COMMISSION, the BEALE STREET MERCHANT ASSOCIATION and other entities conspiring in concert, alone in conspiracy to deny LUCILLE CATRON her constitutional rights as a citizen of the United States, and the City of Memphis, Shelby County. Plaintiff in this action alleges that, certain actions of the defendants, and various other city department heads and employees of the Defendants, and various other department heads and employees violate rights guaranteed to the Plaintiff pursuant to 42 U.S.C Sec. No. 1981, 1983, 1985 (3), 1986 and the First, Fourth, Fifth, Sixth, Eighth and Fourteenth Amendments to the U.S. Constitution and the Civil Rights Act of 1964. The Citizens, The Taxpayers of Memphis, County of Shelby, is being systematically excluded from the Historic Beale Street District, Memphis, TN. Participation in the Beale Street Historic District by the people of ALL RACES is set out in the MASTER LEASE AGREEMENT signed in 1982 between the CITY OF MEMPHIS AND The BEALE STREET DEVELOPMENT CORPORATION (BSDC)

BEALE STREET DEVELOPMENT CORPORATION in 1982 signed a 52 YEAR MASTER LEASE FOR THE Historic Beale Street with the City of Memphis for the redevelopment of Historical Beale Street, a 23 Million Dollar Project of Beale Street Development Corporation.

Beale Street Development Corporation WAS CHARTERED in the State of Tennessee in 1973. Beale Street Development Corporation HOLDS the MASTER LEASE TO ALL PROPERTIES ON BEALE WITH THE EXCEPTION OF ONE property.

ONE OF THE BEALE STREET DEVELOPMENT CORPORATION MISSION was to Redevelop, Revitalize Historical Beale Street. The Beale Street Historical District consists of Second Street to Fourth Street, McCall to Linden. Beale Street Development Corporation lobbied and received from the United States Federal Government the first \$3.2 Million Dollars for the redevelopment, revitalization of Historical Beale. Subsequently, Beale Street Development Corporation received a GRAND TOTAL of \$23 Million Dollars for the redevelopment, revitalization of Historical Beale Street from the United States Federal Government, State of Tennessee, Shelby County and the City of Memphis (In Kind Service) for the redevelopment, revitalization of Historical Beale Street.

Beale Street Development Corporation has caused Historic Beale Street to be one of the safest places in the County of Shelby, City of Memphis per the City of Memphis Police Department per the redevelopment of Historic Beale Street District.

The City of Memphis had no matching funds whereas the City of Memphis as being owners of the land on which the Historical District is located offered IN-KIND SERVICES such as the installation of the services of Memphis Light Gas and Water.

The City of Memphis had no matching fund and per Federal Government mandate and protection for Beale Street Development Corporation as being solely responsible for lobbying and receiving the Millions of Taxpayers Dollars for the redevelopment, revitalization of

Historical Beale Street, the United States Federal Government mandated that the City of Memphis sign a Memorandum of Understanding which so states that Beale Street Development Corporation and the City of Memphis SHALL BE CO-GRANTEES OF HISTORICAL BEALE STREET and Beale Street Development Corporation SHALL not be DICTATED by the City of Memphis and Beale Street Development Corporation received a 52 Year Master Lease for Historical Beale Street. Another Official Document so states the City of Memphis shall give up the LAND OF HISTORICAL BEALE STREET TO Beale Street Development Corporation as the City of Memphis had no matching funds to contribute for the redevelopment, revitalization of Historical Beale Street as promised to Beale Street Development Corporation and the Federal Government.

The Master Lease of Beale Street Development Corporation has for the BEALE STREET ENTERTAINMENT DISTRICT clearly defines the EXPECTATIONS and LIMITATIONS between the two parties, Beale Street Development Corporation and the City of Memphis which also include for Beale Street Development Corporation to CAUSE there to be a Tenant/MERCHANT ASSOCIATION TO BE ESTABLISHED ON HISTORIC BEALE STREET.

Beale Street Development Corporation Master Lease so states that Beale Street Development Corporation is to CAUSE TO BE ESTABLISHED and become a Member of a TENANTS ORGANIZATION for the Beale Street Area which was formerly a non-profit Tenant/BEALE STREET MERCHANT ASSOCIATION and now named the For-Profit Beale Street Merchant Association that is a Defendant in this lawsuit. The Master Lease so states that ALL TENANTS is to be and REMAIN to be MEMBERS OF THE TENANTS ORGANIZATION unless such requirement is waived in writing by the Mayor. NO SUCH REQUIREMENTS HAS EVER BEEN WAIVED BY ANY MAYOR, NO PRIOR WRITTEN APPROVALS. All Tenants shall CAUSE to be paid a pro rata share of all insurance, common area and other maintenance expenses which includes POLICING and SECURITY. Beale Street Development Corporation per MASTER LEASE CONTRACT is the ONLY AUTHORITY to arrange for and provide, or cause to be provided, private security forces, and any other practicable means to maintain adequate physical security. EMPHASIS ADDED.

Beale Street Development Corporation caused THERE TO BE AND the existence of the nonprofit Beale Street Merchant Association and without Authority or approval from Beale Street Development Corporation or the City of Memphis or ALL THE TENANTS/ MERCHANTS ON HISTORICAL BEALE STREET, the Tenants/Beale Street Merchant Association became a For-profit Tenant Association and began charging the TENANTS/MERCHANTS of the Beale Street Merchant Association ADDITIONAL FEES TO REMAIN OR TO BECOME MEMBERS OF THE TENANTS/Beale Street Merchant ASSOCIATION ORGANIZATION. Beale Street Development Corporation Master Lease with the City of Memphis is very specific and unambiguous in the guidelines, purpose, duties and the responsibilities of the Tenants/Beale Street Merchant Association which does not include having the AUTHORITY to charge Tenants/MERCHANTS ADDITIONAL FEES on Beale Street to remain or become members or the AUTHORITY TO CHARGE the TAXPAYING CITIZENS OF MEMPHIS, COUNTY OF SHELBY namely a \$10.00 BEALE STREET BUCK COVER CHARGE/VOUCHER to gain entrance into the public street that is being subsidized daily by the Taxpayers of Shelby County, City of Memphis and that was paid for with

the Millions of Taxpayers Dollars for the redevelopment of public Historic Beale Street including Plaintiff.

A SUBLEASE AGREEMENT was signed in 1982 between the BEALE STREET DEVELOPMENT CORPORATION (BSDC) and John Elkington doing business as ELKINGTON & KELTNER now doing business as Performa Entertainment & Real Estate to MANAGE Historic BEALE STREET.

Beale Street Development Corporation filed a 10 MILLION DOLLAR LAWSUIT AGAINST THE CITY OF MEMPHIS FOR THE many years of the City of Memphis not honoring the Master Lease and for TORTUOUS INTERFERENCE. Per the Master Lease Contract, Beale Street Development and The City of Memphis, the contract so states The City of Memphis is to PAY Beale Street Development Corporation \$15,000.00 per month and that amount of \$15,000 per month is to be revisited every 2 years until PROFIT IS MADE ON HISTORICAL BEALE STREET FOR BEALE STREET DEVELOPMENT CORPORATION efforts in soliciting and receiving the 23 MILLION DOLLAR for the REDEVELOPMENT, REVITALIZATION of HISTORICAL BEALE STREET. The City of Memphis never has paid Beale Street Development Corporation. Beale Street Development Corporation Master Lease Agreement with the City of Memphis does not give the City of Memphis the sole authority to dictate a Fee Cover Charge/Voucher for the Public Historic Beale Street as the City of Memphis became COGRANTEES in the Beale Street Development Corporation acceptance of the MILLIONS OF TAXPAYER DOLLARS and in the colossal amounts of agreements, documents, MANDATES, presentations or promises were there ever mentioned that there would be a charge, a FEE OF ANYKIND for the CITIZENS of the County of Shelby, City of Memphis MILLIONS OF TAXPAYERS DOLLARS received TO GAIN ENTRANCE TO THE PUBLIC HISTORIC BEALE STREET.

The City of Memphis has of February 3, 2015 conspired with others and claimed there has been a Settlement Agreement between the City of Memphis and The Beale Street Development Corporation that solely caused the redevelopment of public Historic Beale Street and in fact there has been no Settlement Agreement. The City of Memphis Fraudulent Settlement Agreement Documents has been verified by a Forensic Handwriting Expert that the signature on document is a FRAUDULENT SIGNATURE of the Former Executive Director, Randle Catron whom is deceased. The Fraudulent Settlement Agreement clearly shows the date of February 3, 2015, the date the City of Memphis so states the Executive Director signed Fraudulent Document ALL WHILE the Executive Director on February 3, 2015 was at Methodist Central Hospital, rushed by ambulance, INTUBATED and placed in the Intensive Care Unit to save his life. The City of Memphis in a ONE DAY, 24 HOURS SPAN, the very next day after they implied a settlement had taken place on February 3, 2015 and on February 4, 2015 SENT BEALE STREET DEVELOPMENT CORPORATION A CHECK that was UNBEKNOWST TO THE BEALE STREET DEVELOPMENT CORPORATION OR ITS BOARD OF DIRECTORS AND OR MR. Randle Catron whom were in the Intensive Care Unit, INTUBATED to save his life sent a payment for \$32,000.00 for settlement agreement and \$6500.00 payments per month for 4 months until the Beale Street Development Corporation Board of Directors found out about FRAUDULENT SETTLEMENT AGREEMENT AND PAYMENTS and had payments stop. That matter is in Chancery Court, County of Shelby. Emphasis Added.

Beale Street Development Corporation filed a LAWSUIT against former Elkington and Keltner now Performa Entertainment for nonpayment per Master Lease Contract Agreement, theft of monies in the amount of \$6 Million Dollars from the profits of Historical Beale Street and being in cahoots with the City of Memphis and others in denying the rightful payments owed and still owed to The Beale Street Development Corporation. Performa Entertainment and Real Estate, John Elkington stated that Beale Street Development Corporation owed him, Mr. John Elkington millions of dollars as Mr. Elkington stated he spent his own personal funds (millions) in the redevelopment of Historical Beale Street after Beale Street Development Corporation hired him, Mr. Elkington to manage the Beale Street properties. That amount Mr. Elkington claimed was never substantiated nor proven per Mr. Elkington own testimony during his deposition and as Mr. Elkington never had a Million Dollars. Factly, per Mr. Elkington own deposition and the Forensic Audit of Historic Beale Street requested by the Beale Street Development Corporation, the Forensic Audit clearly proved the theft of monies in the amount of \$6 MILLION DOLLARS in a 6 year span. The Honorable Judge Donald P. Harris allowed Beale Street Development Corporation to go back 6 years for the Forensic Audit and if malfeasance were found, which there were, the Honorable Judge Donald P. Harris would allow Beale Street Development Corporation to go back additional years. The Forensic Audit proved that Performa Entertainment Real Estate, Mr. Elkington were spending Historic Beale Street PROFITS on other VENTURES outside the City of Memphis including Millions unaccounted for. Therefore, the City of Memphis never paid the Beale Street Development Corporation and nor did Performa Entertainment Real Estate, John Elkington ever pay the MILLIONS OWED TO THE BEALE STREET DEVELOPMENT CORPORATION IN ALL OF THESE 34 YEARS FOR THE REDEVELOPMENT, REVITALIZATION OF THE PUBLIC HISTORIC BEALE STREET per the 52 YEAR MASTER LEASE OF Beale Street Development Corporation.

Taxpayers of Memphis, County of Shelby paid for the Forensic Audit REQUESTED BY THE BEALE STREET DEVELOPMENT CORPORATION of THE PUBLIC Historic Beale Street in the sum of approximately \$1,000,000.00 (One Million Dollars).

After several years of motions and filings for the litigation against the management company Performa Entertain and Real Estate, John Elkington, Performa Entertainment and Real Estate, John Elkington FILED BANKRUPTCY A DAY BEFORE TRIAL. The City of Memphis chose not to bring the Auditors (The Pocalyko Firm) back to testify on behalf of the Forensic Audit and against John Elkington, Performa Entertainment and Real Estate which SUBSEQUENTLY a decision was made in the bankruptcy court for Performa Entertainment and Real Estate, John Elkington to assign his SUBLEASE, the SUBLEASE of Beale Street Development Corporation to the City of Memphis essentially making the City of Memphis, Landlord and Tenant after the City of Memphis and Mr. Elkington negotiated behind closed doors a Sweet Heart Deal which gave Mr. John Elkington Millions for his management efforts and Beale Street Development Corporation nothing even though Mr. Elkington would no longer be MANAGEMENT on Historical Beale Street AND even though the Forensic Audit proved theft of Millions from the PUBLIC HISTORIC BEALE STREET DISTRICT.

Beale Street Development Corporation Sublease to former Elkington and Keltner now DBA as Performa Entertainment Real Estate, John Elkington to manage the Historic Beale Street Properties nor the City of Memphis, nor the Downtown Commission, nor the Downtown Tourism Development Authority and or the Beale Street Merchant Association ever had or was given the authority or consent by the Beale Street Development Corporation whom has the Master Lease and cause the redevelopment of Historic Beale Street and or the Federal Government that is directly responsible for Beale Street Development Corporation to be receipt of the million of dollars in taxpayers funds to redevelop the public Historic Beale Street District to charge the Taxpaying Citizens of Shelby County, City of Memphis a \$10.00 Cover Fee/Voucher to gain entrance to the public Historic Beale Street that was paid for and still subsidize by the Taxpaying Citizens of the County of Shelby, City of Memphis including the Plaintiff.

After the departure of former Elkington and Keltner now DBA as Performa Entertainment Real Estate, John Elkington, the City of Memphis commissioned PAUL MORRIS, PRESIDENT OF DOWNTOWN MEMPHIS COMMISSION TO MANAGE HISTORICAL BEALE STREET on Interim terms.

After the departure of former Elkington and Keltner now DBA as Performa Entertainment Real Estate, John Elkington, the City of Memphis former Mayor, A C Wharton caused to be established the Beale Street Tourism Development Authority and thereby assigned the sublease of Beale Street Development Corporation to the Beale Street Tourism Development Authority (BSTDA). The Beale Street Tourism Development Authority assumed the overall authority to manage the public Historic Beale Street District.

Upon the resignation of Paul Morrison as the President of the Downtown Memphis Commission, The City of Memphis commissioned TERRENCE PATTERSON to be the new President of the DOWNTOWN MEMPHIS COMMISSION and to become Interim Manager of the HISTORIC BEALE STREET DISTRICT in year 2016 whom neither the Tenant/Beale Street Merchant Association, the Downtown Commission or the Beale Street Tourism Development Authority ever had any part whatsoever in the receipt and acceptance of the taxpaying citizens of the County of Shelby, the City of Memphis Millions of Dollars received for the redevelopment of the public Historic Beale Street District.

The City of Memphis and former Mayor, A C Wharton has given the Authority of the Sublease Agreement between the Beale Street Development Corporation and former Elkington and Keltner now DBA as Performa Entertainment and Real Estate, John Elkington to the Beale Street Tourism Development Authority (BSTDA) purposely created by the former Mayor of the City of Memphis, A C Wharton but the control of the public Historic Beale Street currently resides with the Downtown Memphis Commission (DMC) interim manager, President Terrence Patterson whom aligned with the Tenant/Beale Street Merchant Association after being named Interim Manager all of 3 months but has no VOTING AUTHORITY within the Tenant/ Beale Street Merchant Association help cause there to be a \$10.00 Beale Street Buck Coupon/Voucher.

The former Mayor, A. C. Wharton was formerly the Corporate Attorney for Beale Street Development Corporation years prior.

Plaintiff in this action alleges that defendants

1. Defendants are conspiring and denying the low to medium incomes, and or the underprivileged, and or the taxpaying Citizens of the County of Shelby, the City of Memphis, the State of Tennessee to keep off the PUBLIC Historic Beale Street District including Plaintiff.

2. The Defendants is depriving the low to medium incomes, and or the underprivileged Citizens and or taxpaying citizens of Memphis, the County of Shelby, City of Memphis from entering the Beale Street Historic District by CHARGING A FEE OF \$10.00 CASH after a certain time of the evening including Plaintiff.

3. The Defendants is depriving the low to medium incomes and or the underprivileged and or the taxpaying citizens of Memphis, County of Shelby from entering the Beale Street Historic District by CHARGING A FEE OF \$10.00 CASH after a certain time and the citizens of Shelby County, the City of Memphis are Only RECEIVING in return for their \$10.00 a \$7.00 BEALE STREET BUCK VOUCHER COUPON including Plaintiff.

4. The Defendants is depriving the low to medium incomes and or the underprivileged citizens and or the taxpaying Citizens of Shelby County, City of Memphis, a \$10.00 Fee for entering public Historic Beale Street and keeping \$3.00 NON RETURNABLE FEE including Plaintiff.

5. The Defendants is depriving the low to medium incomes citizens and or the underprivileged citizens and or the taxpaying Citizens of Shelby County, City of Memphis, because the low to medium income taxpaying citizens of Shelby County, City of Memphis are forced to PAY a \$10.00 Cover Charge Fee and if they do not, the citizen of Shelby County, City of Memphis are not allowed to stroll down the Public Historic Beale Street on a Saturday night which is what made Beale Street famous from the beginning including the plaintiff.

6. The Defendants is depriving the low to medium incomes citizens and or the underprivileged citizens and or the taxpaying Citizens of Memphis, County of Shelby from entering the Beale Street Historic District by forcing and making it mandatory that the Citizens of Shelby County, City of Memphis must purchase goods or services upon paying the \$10.00 Cover Charge Fee/Voucher to enter on the PUBLIC Historic Beale Street without the offer of a REFUND if citizens decides not to use the coupon/voucher for purposes of their liking including Plaintiff. There is a NO REFUND POLICY as shown on Coupon/Voucher.

7. The Defendants is depriving the low to medium incomes and or the underprivileged citizens and or the taxpaying citizens of Memphis, County of Shelby from entering the Beale

Street Historic District by charging a \$10.00 COVER CHARGE FEE to GAIN ENTRANCE on the PUBLIC HISTORIC BEALE STREET whereas the Citizen of Shelby County, City of Memphis TAX DOLLARS paid the Millions to fund the redevelopment and revitalization of the Public Historic Beale Street causing Double Taxation including Plaintiff.

8. The Defendants is depriving the low to medium incomes and or the underprivileged and or the taxpaying citizens of Memphis, County of Shelby from entering the Beale Street Historic District by charging a \$10.00 COVER CHARGE FEE to GAIN ENTRANCE on the PUBLIC HISTORIC BEALE STREET whereas the Citizen of Shelby County, City of Memphis low to medium incomes and or taxpaying citizens TAX DOLLAR are paying for the public services for the Public Historic Beale Street which includes Memphis POLICE DEPARTMENT, Sheriff Department, FIRE DEPARTMENT, GRABAGE PICKUP, CLEAN UP ON HISTORIC BEALE STREET creating Double Taxation for the Citizens of the County of Shelby, The City of Memphis including Plaintiff.

9. The Defendants is depriving the low to medium incomes and or the underprivileged and or the taxpaying Citizens of Shelby County, City of Memphis, because THE City of Memphis, The Beale Street Merchant Association AND THE DOWNTOWN COMMISSION are DOUBLE TAXING THE COUNTY OF SHELBY, CITY OF MEMPHIS CITIZENS TAXPAYERS by charging the \$10.00 entry fee, paying for city services for the Historic Beale Street that includes overtime pay for the Police, Sheriff Department causing Double Taxation for the Citizens of the County of Shelby, City of Memphis including Plaintiff.

10. The Defendants is depriving the low to medium incomes and or the underprivileged and or the taxpaying Citizens of Shelby County, City of Memphis, because IF THE said CITIZENS CHOOSE NOT TO PURCHASE LIQUOR, FOOD OR MERCHANDISE ON the Public Historic Beale Street, THE CITIZENS ENTIRE \$7.00 becomes the PROFITS OF THE BEALE STREET MERCHANT ASSOCIATION WHOM DOES NOT HAVE THE LEGAL AUTHORITY PER MASTER LEASE OR OTHERWISE TO ACCEPT, SPEND, KEEP OR DISTRIBUTE THE DOUBLE TAXATION CITIZENS FUNDS OF \$7.00 INCLUDING THE Plaintiff.

11. The Defendants is depriving the low to medium incomes and or the underprivileged and or the taxpaying Citizens of Shelby County, City of Memphis by way of Double Taxation as the Citizens of Shelby County, City of Memphis paid approximately \$1,000,000.00 (One Million Dollars) for a Forensic Audit of Historic Beale Street to find out where the taxpayers monies had been expended and the City of Memphis DENIED Beale Street Development Corporation, a nonprofit corporation and the Citizens of Memphis, County of Shelby the right to use Forensic Audit as the City of Memphis refused to bring back the Forensic Auditors to Memphis to testify in the trial of Performa Entertainment Real Estate and John Elkington in BANRYPTCY COURT on behalf of the Citizens of Shelby County, City of Memphis thereby causing the loss of the Taxpaying Citizens of Shelby County, City of Memphis approximate \$1 Million Dollars in the payment to the Auditing Firm Pocalyko and the loss of ALL THE MILLIONS OWED by Performa Entertainment Real Estate, John Elkington per Pocalyko Forensic Audit and or ALL THE MONEY PAID BY THE TAXPAYERS OF THE COUNTY OF SHELBY, CITY OF MEMPHIS for the redevelopment, revitalization of the Public Historic Beale Street including Plaintiff. Emphasis Add

12. Defendants are MISLEADING the low to medium income and or the underprivileged and or the taxpaying citizens of Memphis, County of Shelby by CHARGING a \$10.00 COVER CHARGE FEE AT EACH ENTRANCE WAY to gain entrance on the Public Historic Beale Street but MISLEADING the citizens by not informing the citizens that MANY OF THE MERCHANTS ARE NOT ACCEPTING THE COVER CHARGE/BEALE STREET BUCK COUPON/VOUCHER such as World Renown BB King Club, The New Daisy, The Historical Daisy, Wet Willie's, some of the Largest Tenants/Merchants on Historical Beale Street in addition to others therefore the citizens believe that that the Beale Street Buck Coupon Voucher is deceptive, misleading and misrepresented as many of the Tenants/Merchants are not accepting the Beale Street Buck Coupon/Voucher including the Plaintiff.

13. The Defendants is depriving the low to medium income and or the underprivileged, and or the taxpaying citizens of the County of Shelby, City of Memphis by causing Double Taxation and Taxation without Representation as the Beale Street Merchant Association purposely, systematically initiated and promoted the \$10.00 Beale Street Buck Cover Charge Fee to gain entry to the public Historic Beale Street District to keep a segment of the community citizens of the County of Shelby, the City of Memphis off the public Historic Beale Street whereas the Beale Street Merchant Association does not have 1 (one) Representative of the 7 (Seven) Persons Voting Board that represents the more than 60-65 % of the taxpaying citizens that already paid the Millions of Dollars that caused the redevelopment of the Public Historic Beale Street District the County of Shelby, City of Memphis City and the citizens pay for the city service such as Police, Sheriff Department, Fire and Sanitation that is on Historic Beale Street including overtime pay, including the Police Precinct that is housed on the Public Historic Beale street paid by the Citizens of Memphis, County of Shelby including Plaintiff.

14. The Defendants is denying and depriving the low to medium incomes, the underprivileged taxpaying Citizens of Shelby County, City of Memphis as THE REMAINING TAXPAYERS \$3.00 is being kept for ADMINISTRATIVE FEE. The Beale Street Merchant Association DO NOT HAVE THE LAWFUL AUTHORITY OR OTHERWISE PER MASTER LEASE AGREEMENT TO CHARGE, CONSIDER, INSITUTE, CONTRIBE CHARGING THE TAXPAYING CITIZENS OF SHELBY COUNTY, CITY OF MEMPHIS a FEE of ANYKIND chose a FRIEND, an EMPLOYEE of one of the establishments on Historic Beale Street to form HIS/HER OWN BUSINESS OR COMPANY FOR THE SOLE PURPOSE OF THE COLLECTION OF THE \$10.00 ENTRY FEE AND keeping the citizens of the County of Shelby, the City of Memphis \$3.00 causing Taxation without Representation as their decision is not, was not REPRESENTATIVE OF THE 60-65 PERCENT OF THE County of Shelby, City of Memphis Taxpayers whom paid the Millions of dollars for the redevelopment, revitalization of the Public Historic Beale Street including Plaintiff.

15. Defendants are depriving the low to medium income and or the underprivileged d and or the taxpaying citizens of Memphis, County of Shelby the right to stroll down the Historic Beale Street on a Saturday night which is what made Beale Street famous from the beginning by charging a \$10.00 Fee to gain entrance to the public Historic Beale Street including Plaintiff.

16. Defendants are depriving and denying the low to medium income citizens and or the underprivileged and or the taxpaying citizens of Memphis, County of Shelby the right to enjoy THE PUBLIC Historic Beale Street in the manner that was set out in the MASTER LEASE AND IN THE ACCEPTANCE OF THE 23 MILLION DOLLARS FROM THE FEDERAL GOVERNMENT, THE STATE OF TENNESSEE, SHELBY COUNTY and the IN-KIND SERVICES OF THE CITY OF MEMPHIS by not informing the TAXPAYING CITIZENS OF MEMPHIS BEFORE OR AFTER RECEIVING THE TAXPAYERS FUNDS THAT THEY WOULD BE CHARGED, OR EVER BE CHARGD a FEE for the CITIZENS OF MEMPHIS TO STROLL DOWN THE PUBLIC HISTORIC BEALE STREET.

17. Defendants are depriving and denying the low to medium income and or the underprivileged citizens and or the taxpaying citizens of Memphis, County of Shelby whereas the taxpaying citizens of the County of Shelby, City of Memphis paid Millions of Dollars that caused the very existence of the Tenants/Beale Street Merchants Association to have businesses on the Public Historic Beale Street by the use of the taxpayers Millions of Dollars for the redevelopment, revitalization of Public Historic Beale Street including Plaintiff.

18. Defendants are depriving the low to medium income and or the underprivileged and or the taxpaying citizen with Taxation without Representation as the Beale Street Merchant Association created their own For Profit Tenant/Merchant Association which charges the Merchants additional fees that is outside the scope of the Master Lease Contract that says "ALL MERCHANTS SHALL BECOME A MEMBER OF THE TENANT/MERCHANT ASSOCIATION," and "REMAIN MEMBERS OF THE TENANT MERCHANT ASSOCIATION," in which the additional fees created total hardship for the smaller Merchants that were unable to pay therefore the Merchants can't participate and or become voting members and or members of the Voting Board of the Tenant/Merchant Association by owing the Tenant/Beale Street Merchant Association THOUSAND OF DOLLARS in illegal Merchant Association fees imposed by the Beale Street Merchant Association therefore there is no representative and or representation of the 60-65 percent of citizens of the County of Shelby, The City of Memphis that caused the very existence of the Beale Street Merchant Association upon receiving the Taxpayers Millions of Dollars in the County of Shelby, City of Memphis to fund the redevelopment, revitalization of the Public Historic Beale Street District including Plaintiff.

19. Defendants are depriving and denying the low to medium income and or the underprivileged and or the taxpaying citizen with Taxation without Representation as the Beale Street Merchant Association disband the Non-Profit Tenant/Merchant Association and created their own For Profit Charter which charges the Merchants additional fees that is outside the scope of the Master Lease Contract that says ALL MERCHANTS SHALL BECOME A MEMBER OF THE TENANT/MERCHANT ASSOCIATION and in which the imposed fees created total hardship for the smaller Merchants to pay the imposed FEES causing thousands of dollars in fees to be owed by merchants and causing merchants to not be eligible to participate and or become board members, voting members and or members of the Tenant/Beale Street Merchant Association causing there to be no representation of the 60-65 percent of the population of the citizens of the County of Shelby, City of Memphis that cause the 23 Million Dollar taxpayers funded redevelopment, revitalization of the public Historic Beale Street including Plaintiff.

20. Defendants are depriving and denying the low to medium income and or the underprivileged and or the taxpaying citizen causing Taxation without Representation as the Beale Street Merchant Association disband the Non-Profit Tenant/Beale Street Merchant Association and created their own For Profit Tenant/Beale Street Merchant Association which charges the Merchants additional fees that is outside the scope of the Master Lease Contract that says ALL MERCHANTS SHALL BECOME A MEMBER OF THE TENANT/MERCHANT ASSOCIATION and REMAIN MEMBERS thereby excluding many merchants per Master Lease thereby allowing the For Profit Beale Street Merchant Association 7 (seven) voting Board Members that DOES NOT REPRESENT OR IS REPRESENTATIVE of the 60-65 of the County of Shelby, City of Memphis Taxpaying CITIZENS that paid the Millions for the redevelopment, revitalization of the Public Historic Beale Street therefore the decisions are effortlessly made to charge the citizens of the County of Shelby, City of Memphis and denying entrance into the Public Historic Beale Street with the \$10.00 Entry Fee including Plaintiff.

21. Defendants are depriving and denying the low to medium income and or the underprivileged and or the taxpaying citizen with Taxation without Representation as the Beale Street Merchant Association disband the Non-Profit Tenant/Merchant Association and created their own For Profit Beale Street Merchant Association which charges the Merchants additional fees that is outside the scope of the Master Lease Contract that says ALL MERCHANTS SHALL BECOME A MEMBER OF THE TENANT/MERCHANT ASSOCIATION and REMAIN TENANTS thereby excluding Merchants per Master Lease thereby allowing the For Profit Beale Street Merchant Association 7 (seven) voting Board Members that does not represent and or is not representative of the 60-65 percent of the citizens of the County of Shelby, City of Memphis that paid the 23 Million dollars for the redevelopment, revitalization of the Public Historic Beale Street to effortlessly make a decisions to create a Fast Past Tickets that allows citizens and or persons that can pay more to gain entrance on the Historic Beale Street to skip the already patrons in line expediting their entrance with the Beale Street Fast Pass on the public Historic Beale Street and denying the citizens of the County of Shelby, City of Memphis equal access to enter the Historic Beale Street District that paid the Millions of Dollars in Taxpayers funds for the redevelopment of the Historic Beale Street District including plaintiff.

22. Defendants are depriving and denying the low to medium income and or the underprivileged and or the taxpaying citizen with Taxation without Representation as the Beale Street Merchant Association disband the Non-Profit Tenant/Merchant Association and created their own For Profit Beale Street Merchant Association which charges the Merchants additional fees to become a member of the Merchant Association which is outside of the scope of the Master Lease that caused the Tenant/Merchant Association to be established and the Master Lease so states that ALL MERCHANTS SHALL BECOME A MEMBER OF THE TENANT/MERCHANT ASSOCIATION and REMAIN TENANTS therefore the For-Profit Beale Street Merchant Association is excluding Merchants from being able to participate, to become one of the Beale

Street Merchant Association 7 (seven) voting Board Members that does not and is not representative of the 60-65 percent of the County of Shelby, City of Memphis citizen who paid the 23 Million dollars for the redevelopment, revitalization of the Public Historic Beale Street and the Beale Street Merchant Association, the City of Memphis, the Downtown Commission effortlessly allows the Beale Street Merchant Association to systematically exclude the 60-65 percent segment of the population of the County of Shelby, the City of Memphis the opportunity to enjoy the Beale Street Historic District as outlined in the Master Lease of the Beale Street Development Corporation by charging the \$10.00 Entry Fee including Plaintiff.

23. Defendants are conspiring, depriving and denying the low to medium income and or the underprivileged and or the taxpaying citizen with Taxation without Representation as the Beale Street Merchant Association disband the Non-Profit Tenant/Merchant Association and created their own For Profit Beale Street Merchant Association which charges the Merchants additional fees to become a member of the Merchant Association which is outside of the scope of the Master Lease that caused the Tenant/Merchant Association to be established and the Master Lease so states that ALL MERCHANTS SHALL BECOME A MEMBER OF THE TENANT/MERCHANT ASSOCIATION and REMAIN TENANTS therefore the For-Profit Beale Street Merchant Association is excluding Merchants from being able to participate, to become one of the Beale Street Merchant Association 7 (seven) voting Board Members that does not is not represent or representative of the 60-65 percent of the County of Shelby, City of Memphis citizens who paid the 23 Million dollars for the redevelopment, revitalization of the Public Historic Beale Street and thereby has totally ignored the United States Federal Government MANDATES that is outlined in the Master Lease and in the RECEIPT AND ACCEPTANCE of the Millions of Taxpayers dollars that ALL RACES ARE TO ENJOY the public Historic Beale Street and by allowing the Beale Street Merchant Association to effortlessly, systematically exclude 60-65 percent segment of the population in the County of Shelby, the City of Memphis by charging a \$10.00 Fee to gain entrance on Public Historic Beale Street including Plaintiff.

24. Defendants are conspiring, depriving and denying the low to medium income and or the underprivileged and or the taxpaying citizen with DOUBLE TAXATION and TAXATION WITHOUT REPRESENTATION as the City of Memphis and the Tenants/Beale Street Merchant Association has totally ignored the United States Federal Government MANDATE in the RECEIPT AND ACCEPTANCE of the Millions of Taxpayers Dollars that Mandated the SPREADING THE WEALTH on Historical Beale Street and as of date, the Beale Street Merchant Association particularly the Seven (7) Voting Members has never made public to the taxpayers and or shared with the other Beale Street Merchants that have been SYSTEMATICALLY EXCLUDED because of the IMPOSED Membership Fee any of the profits, grants received, sponsorships, how much in banks, WHAT BANK or WHOM decides or determines how much and where the Profits are to be spent AND on what and why nor the amount of Membership Fees collected as ALL THE INFORMATION HAS BEEN KEPT A SECRET AND CONTAINED PURPOSELY BY TENANTS/BEALE STREET MERCHANT ASSOCIATION particularly the Seven (7) Voting Members in which none of the seven (7) voting members represent and or are representative of the 60-65 percent of the City of Memphis, County of Shelby population that funded the

redevelopment of Historic Beale Street and still fund and provide for police and sanitation on Historic Beale Street and ALL WHILE the Citizens of Memphis, County of Shelby Taxpayer dollars made it POSSIBLE for the Tenants/Beale Street Merchant Association to be in existence, ALL WHILE THE CITIZENS OF Memphis, County of Shelby is paying for city services such as Police, Sheriff, Sanitation including ALL OVERTIME PAY on HISTORICAL BEALE STREET while the TENANTS/Beale Street Merchant Association is sponsoring MANY FOR PROFIT MAJOR EVENTS and BOUND AND OBLIGATED TO PROVIDE FOR ADEQUATE POLICING AND SECURITY YET PROFITING FROM PROVIDING INADEQUATE, SUBSTANDARD SECURITY by paying less and less for policing and security for Historical Beale Street causing the Citizens of Memphis, County of Shelby taxpaying citizens to pay FOR THEIR MAJOR EVENTS IN PROVIDING EXTRA POLICE STAFFING AND OVERTIME PAY and charging the City of Memphis, County of Shelby \$10.00 to enter Historic Beale Street creating Double Taxation and NOT SHARING THE WEALTH including the Plaintiff.

25. Defendants are conspiring, depriving and denying the low to medium income and or the underprivileged and or the taxpaying citizen with Taxation without Representation as the Beale Street Merchant Association disband the Non-Profit Tenant/Merchant Association and created their own For Profit Beale Street Merchant Association which charges the Merchants additional fees to become a member of the Merchant Association which is outside of the scope of the Master Lease that caused the Tenant/Merchant Association to be established and the Master Lease so states that ALL MERCHANTS SHALL BECOME A MEMBER OF THE TENANT/MERCHANT ASSOCIATION and REMAIN MEMBERS AND cause to be paid for Policing and Security and that The Beale Street Development Corporation SHALL BE RESPONSIBLE FOR PROVIDING AND MAINTAINING ADEQUATE PHYSICAL SECURITY FOR THE BEALE STREET AREA AND ITS PATRONS. TO FULFILL THIS OBLIGATION, TENANTS SHALL ARRANGE FOR AND PROVIDE, OR CAUSE TO BE PROVIDED, PRIVATE SECURITY FORCES, AND ANY OTHER PRATICABLE MEANS TO MAINTAIN ADEQUATE PHYSICAL SECURITY. The citizens of the county of Shelby, the City of Memphis is paying for security each and every day causing Double Taxation even in the Overtime Pay for the Police, Sheriff, Ambulance and Sanitation when the citizens of the County of Shelby and the City of Memphis Taxpayers paid the Millions of Dollars for the redevelopment of Historical Beale Street District including Plaintiff.

26. Defendants are conspiring, depriving and denying the low to medium income and or the underprivileged and or the taxpaying citizen with Double Taxation and Taxation without Representation as the Beale Street Merchant Association disband the Non-Profit Tenant/Merchant Association and created their own For Profit Beale Street Merchant Association which charges the Merchants additional fees to become a member of the Merchant Association which is outside of the scope of the Master Lease that caused the Tenant/Merchant Association to be established and the Master Lease so states that ALL MERCHANTS SHALL BECOME A MEMBER OF THE TENANT/MERCHANT ASSOCIATION and REMAIN MEMBERS AND cause to be paid for Policing and Security and that The Beale Street Development Corporation SHALL BE RESPONSIBLE FOR PROVIDING AND MAINTAINING ADEQUATE PHYSICAL SECURITY FOR THE BEALE STREET AREA AND ITS PATRONS. TO FULFIL THIS OBLIGATION, TENANTS SHALL ARRANGE FOR AND PROVIDE, OR CAUSE TO BE PROVIDED, PRIVATE SECURITY FORCES, AND

ANY OTHER PRATICABLE MEANS TO MAINTAIN ADEQUATE PHYSICAL SECURITY whereas the Tenant/Beale Street Merchant Association has collected Membership fees over the years and invested those monies into other ventures/events on Historical Beale or off Historical Beale Street creating HUGE PROFITS for the Tenant/Beale Street Merchant Association in which the Tenant/Beale Street Merchant Association is to provide ADEQUATE POLICING AND SECURITY for Historic Beale Street as outlined in the Master Lease and the Tenant/Beale Street Merchant Association are PAYING LESS AND LESS FOR SECURITY EACH YEAR putting the citizens of the County of Shelby, the City of Memphis SAFETY AT RISK who paid the Millions of Dollars for the redevelopment of Historic Beale Street AND causing the Citizens of the County of Shelby, City of Memphis to be Double Taxed by paying for the City of Memphis services for Police, Sheriff, Fire and Sanitation including overtime pay continuously to Police for HISTORICAL BEALE STREET including Plaintiff.

27. Defendants are conspiring, depriving and denying the low to medium income and or the underprivileged and or the taxpaying citizen with Double Taxation as the Beale Street Merchant Association disband the Non-Profit Tenant/Merchant Association and created their own For Profit Beale Street Merchant Association which charges the Merchants additional fees to become a member of the Merchant Association which is outside of the scope of the Master Lease that caused the Tenant/Merchant Association to be established and the Master Lease so states that ALL MERCHANTS SHALL BECOME A MEMBER OF THE TENANT/MERCHANT ASSOCIATION and REMAIN MEMBERS AND cause to be paid for Policing and Security and that The Beale Street Development Corporation SHALL BE RESPONSIBLE FOR PROVIDING AND MAINTAINING ADEQUATE PHYSICAL SECURITY FOR THE BEALE STREET AREA AND ITS PATRONS. TO FULFILL THIS OBLIGATION, TENANTS SHALL ARRANGE FOR AND PROVIDE, OR CAUSE TO BE PROVIDED, PRIVATE SECURITY FORCES, AND ANY OTHER PRATICABLE MEANS TO MAINTAIN ADEQUATE PHYSICAL SECURITY and the Tenant/Beale Street Merchant Association, the City of Memphis has been in violation of the Master Lease Contract as the Tenant/Beale Street Merchant Association, the City of Memphis has always EXCLUDED THE BEALE STREET DEVELOPMENT CORPORATION FROM THE SELECTION OF SECURITY, POLICING, Or any other PRATICAL MEAN PER MASTER LEASE AGREEMENT THEREFORE the Public NON-PROFIT ORGANIZATION HAD NO KNOWLEDGE that the TAXPAYERS OF THE COUNTY OF SHELBY, THE CITY OF MEMPHIS that paid the Millions of Dollars for the redevelopment of Historic Beale Street PATRONS SAFETY WAS BEING PUT AT RISK because of the substandard private SECURITY AND POLICING that was being PROVIDED by the Tenant/Beale Street Merchant Association as Security and Policing were BEING PAID LESS AND LESS and causing the Taxpaying Citizens of the County of Shelby, City of Memphis to have to be Double Taxation in paying for Police, Sheriff, Fire and Sanitation including overtime pay for Security and Policing on the Public Historic Beale Street including Plaintiff.

28. Defendants are conspiring, depriving and denying the low to medium income and or the underprivileged and or the taxpaying citizen with Double Taxation and Taxation without Representation as the Beale Street Merchant Association disband the Non-Profit Tenant/Merchant Association and created their own For Profit Beale Street Merchant Association which charges the Merchants additional fees to become a member of the Merchant

Association which is outside of the scope of the Master Lease that caused the Tenant/Merchant Association to be established and the Master Lease so states that ALL MERCHANTS SHALL BECOME A MEMBER OF THE TENANT/MERCHANT ASSOCIATION and REMAIN MEMBERS therefore the For-Profit Beale Street Merchant Association has excluded Merchants from being able to participate, to become one of the Beale Street Merchant Association 7 (seven) voting Board Members that does not and is not representative of the 60-65 percent of the County of Shelby, City of Memphis citizen who paid the 23 Million dollars for the redevelopment, revitalization of the Public Historic Beale Street by charging the substantial fees that is not in the Master Lease and the Beale Street Merchant Association, the City of Memphis, the Downtown Commission effortlessly allows the Beale Street Merchant Association to systematically exclude the 60-65 percent of the County of Shelby, the City of Memphis race of people by not having any MAJOR EVENTS OR ENTERTAINMENT ON HISTORICAL BEALE STREET REPRESENTATIVE OF THE BLUES IN WHICH THAT IS WHAT BEALE STREET IS KNOWN FOR AROUND THE WORLD but the Tenant/Beale Street Merchant Association, the Downtown Commission will pay for MAJOR EVENTS such as COUNTRY ON BEALE, EVENTS THAT DOES NOT have one representative of the 60-65 percent of the County of Shelby, City of Memphis TAXPAYING CITIZENS that paid the Millions of Dollars for the redevelopment of Public Historical Beale Street causing for the 60-65 percent of the Taxpaying Citizen of the County of Shelby, City of Memphis to have to pay for the POLICING, SECURITY, SANITATION AND FIRE FOR THOSE MAJOR EVENTS and receive absolutely nothing in return including PLAINTIFF.

29. . Defendants are conspiring, depriving and denying the low to medium income, underprivileged taxpaying citizen with Double Taxation and Taxation without Representation as the Beale Street Merchant Association disband the Non-Profit Tenant/Merchant Association and created their own For Profit Beale Street Merchant Association which charges the Merchants additional fees to become a member of the Merchant Association which is outside of the scope of the Master Lease that caused the Tenant/Merchant Association to be established and the Master Lease so states that ALL MERCHANTS SHALL BECOME A MEMBER OF THE TENANT/MERCHANT ASSOCIATION and REMAIN MEMBERS therefore the For-Profit Beale Street Merchant Association has excluded Merchants from being able to participate, to become one of the Beale Street Merchant Association 7 (seven) voting Board Members that does not and is not representative of the 60-65 percent of the County of Shelby, City of Memphis citizen who paid the 23 Million dollars for the redevelopment, revitalization of the Public Historic Beale Street by charging the fees that is not in the Master Lease and the Beale Street Merchant Association, the City of Memphis, the Downtown Commission effortlessly allows the Beale Street Merchant Association to systematically exclude the 60-65 percent of the County of Shelby, the City of Memphis POPULATION race of people AND the City of Memphis and the Tenant/Beale Street Merchant Association effortlessly has CREATED ESSENTIALLY TWO BEALE STREETS as the 7 Person Voting Board Members with the EXCEPTION OF ONE are ALL ON THE WEST END OF BEALE and ALL THE MONEY, PROFITS, GRANTS, SPONSORSHIPS DOWNTOWN COMMISSION GRANTS ARE DICTATED BY THE TENANT/BEALE STREET MERCHANT ASSOCIATION ON THE WEST END AND ALL THE MONEY IS SPENT ON THE WEST END causing NO SPREADING OF WEALTH as MANDATED BY THE FEDERAL GOVERNMENT, CAUSING ECONOMIC DISPARITY as the EAST END represents and or representative of the 60-65 Percent of the population of the

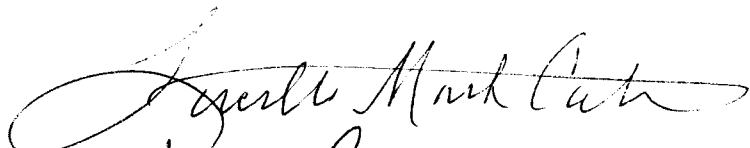
City of Memphis, County of Shelby that cause the redevelopment of Historic Beale Street AND no PROVISION ARE MADE TO PROVIDE ENTERTAINMENT AND OR OTHER MAJOR EVENTS ON THE WEST END OF BEALE CREATING TOTAL SEPERATION therefore NO ENJOYMENT OF ALL THE RACES as set out in the Master Lease Agreement AND the 60-65 percent of the Taxpaying Citizens of the County of Shelby, the City of Memphis that paid the Millions for the redevelopment of Public Historic Beale Street is paying for City Services, Police, Sheriff Department, Sanitation and Fire ON THE EAST END AND THE WEST END IN WHICH THE TENANT/BEALE STREET MERCHANT ASSOCIATION IS OBLIGATED AND BOUND BY THE MASTER LEASE CONTRACT TO PROVIDE POLICING AND SECURITY but the Taxpaying Citizens of Memphis, the County of Shelby are paying and providing policing and security including Plaintiff.

30. Defendants are conspiring, depriving and denying the low to medium income and or the underprivileged and or the taxpaying citizen with Double Taxation and Taxation without Representation as the Beale Street Merchant Association disband the Non-Profit Tenant/Merchant Association and created their own For Profit Beale Street Merchant Association which charges the Merchants additional fees to become a member of the Merchant Association which is outside of the scope of the Master Lease that caused the Tenant/Merchant Association to be established and the Master Lease so states that ALL MERCHANTS SHALL BECOME A MEMBER OF THE TENANT/MERCHANT ASSOCIATION and REMAIN MEMBERS therefore the For-Profit Beale Street Merchant Association has excluded Merchants from being able to participate, to become one of the Beale Street Merchant Association 7 (seven) voting Board Members who does not and is not representative of the 60-65 percent of the County of Shelby, City of Memphis taxpaying citizen who paid the 23 Million dollars for the redevelopment, revitalization of the Public Historic Beale Street AND THE City of Memphis, the Downtown Commission effortlessly allows the Beale Street Merchant Association to systematically exclude the 60-65 percent of the County of Shelby, the City of Memphis race of people by charging a \$10.00 Fee to Gain Entrance onto the Public Historic Beale Street a certain time of the evening and the Tenants/Beale Street Merchant Association is to CHARGE THE \$10.00 FEE FOR ONE OF THE LARGEST EVENTS in the City of Memphis , THE SOUTHERN HERITAGE CLASSIC which REPRESENTS 50,000 people which includes and representative of the 60-65 percent of the City of Memphis, County of Shelby taxpaying citizens whom paid the Millions for the redevelopment of the Public Historic Beale Street and still pay for the City services such as Police, Sheriff Department, Sanitation and Fire Department on Historical Beale Street including the Police Precinct located on Historical Beale Street, funded by the taxpayers ALL WHILE the \$10.00 FEE to gain entrance on the Public Historic Beale Street will knowingly create a HUGE PROFIT for the Tenants/Beale Street Merchant Association whom is BOUND BY THE FOUR CORNERS OF THE MASTER LEASE TO PROVIDE POLICING AND SECURITY BUT HAVE NOT PROVIDED ADEQUATE POLICING AND SECURITY AND the Citizens of Memphis, County of Shelby will have to pay for Policing and Security including OVERTIME PAY for the Public Historic Beale Street and the \$10.00 Fee to Gain Entrance into Historical Beale Street CAUSING Double Taxation and or Taxation without Representation including Plaintiff.

WHEREUPON THE PLAINTIFF PRAYS:

1. An Injunction and Restraining Order prohibiting Defendants from Charging or Collecting any Money from the Taxpaying Citizens, the low to moderate income citizens, the Underprivileged of the County of Shelby, The City of Memphis a Fee of ANYKIND to gain Entrance into the Public World Famous Historic Beale Street and the walkways in and around The World Famous Historic Beale Street INCLUDING but not limited to THE BEALE STREET BUCK COUPON/VOUCHER and the BEALE STREET FAST PASS COUPON. Historic Beale Street is a Public Street funded by the Taxpayers in Memphis, Tenn. County of Shelby.
2. Punitive Damages because of the Intentional, Continuously, Systematically Denial of Equal Access to the Daytime Taxpaying Citizens and or low to moderate income citizens and or the underprivileged citizens of Memphis, County of Shelby on the Beale Street Historic District vs. Equal Access to the Night Time Taxpaying Citizens and or low to moderate income citizens and or underprivileged citizens.
3. Punitive Damages in the amount of \$5,000,000.00 (Five Million Dollars) for Intentionally, Systematically, Purposefully excluding the low to moderate income citizens and or the Taxpaying Citizens and or the underprivileged citizens from the Equal Enjoyment on Historic Beale Street, Equal participation on Historic Beale Street, Equal Access to gain entrance on Historic Beale Street, Equal Opportunity on Historic Beale Street, Equal Entertainment on Historic Beale Street, Equal Rules and Regulations, ECONOMIC EQUALITY on Historic Beale Street.
4. That ALL TENANTS SHALL BECOME MEMBERS OF THE TENANTS/BEALE STREET MERCHANT ASSOCIATION and REMAIN MEMBERS AS OUTLINED IN THE MASTER LEASE AGREEMENT AND THE MEMBERSHIP FEES CAUSED BY THE TENANT/BEALE STREET MERCHANT ASSOCIATION CEASE AND DESIST AND WOULD ALLOW EQUAL ACCESS, ECONOMIC EQUALITY AND EQUAL REPRESENTATION.
5. THAT the POLICING AND SECURITY BE SELECTED AND MONITORED BY THE BEALE STREET DEVELOPMENT CORPORATION OUTLINED IN THE MASTER LEASE AS TO PROVIDE ADEQUATE SECURITY AND POLICING FOR THE SAFETY OF THE PATRONS, CITIZENS OF PUBLIC HISTORIC BEALE STREET DISTRICT.
6. The Plaintiff relied on THE BEALE STREET DEVELOPMENT CORPORATION WRITTEN MASTER LEASE AGREEMENT and the MANDATES OF THE UNITED STATES FEDERAL GOVERNMENT signed by Defendants(s) which also includes for ALL RACES, ALL PARTICIPATION in the ENJOYMENT OF THE BEALE STREET, SPREADING THE WEALTH on HISTORIC Beale Street that was FUNDED BY THE TAXPAYERS DOLLARS.

7. Plaintiff REQUEST that all MONIES COLLECTED FROM THE \$10.00 FEE AND THE FAST PASS to gain entrance on the public Historic Beale Street be RETURNED TO THE TAXPAYERS AND OR DONATED TO THE MEMPHIS POLICE DEPARTMENT AND OR THE SHERIFF DEPARTMENT FOR THEIR TIRELESS EFFORTS and PARTICIPATION IN COMMUNITY CAUSES AND EVENTS.
8. For the Tenants/Beale Street Merchant Association to Share the Wealth on Historic Beale Street, to be transparent with ALL THE MERCHANTS ON HISTORIC BEALE STREET with MONEY RECEIVED and or SPENT , to inform ALL MERCHANTS of bank accounts, amount in bank accounts, What bank accounts, what Events being sponsored and or Events that makes a PROFITS so ALL MERCHANTS CAN SHARE IN THE WEALTH ON THE PUBLIC HISTORIC BEALE STREET and not just a SELECTIVE FEW.
9. PLAINTIFF REQUEST FOR A JURY TRIAL


1009 GRAND Street
Memphis, TN 38114

8/12/14